

PHILADELPHIA ELECTRIC COMPANY

LIMERICK GENERATING STATION

P. O. BOX A

SANATOGA, PENNSYLVANIA 19464

(215) 327-1200 EXT. 2000

March 22, 1991

J. DOERING, JR.
PLANT MANAGER
LIMERICK GENERATING STATION

Mr. Joeseeph A. Feola
Regional Water Quality Manager
Southeast Regional Office
Lee Park Suite 6010
555 North Lane
Conshohocken, PA 19428

Subject: Limerick Generating Station, Units 1 and 2
Noncompliance with NPDES Permit No. PA-0051926

Dear Mr. Feola,

During the performance of a Storm Drain System walkdown on February 4, 1991, the plant system engineer identified that a design deficiency in the Storm Drain System existed involving certain normal waste drains located in both the Unit 1 and Unit 2 Reactor Enclosures (RE). The purpose of the normal waste drains associated with the RE ventilation fan rooms is to collect liquid wastes from equipment (i.e., heating coils associated with RE supply fans) and floor drains from a non-radiological portion of the plant and then route this flow directly to the Holding Pond. However, the plant system engineer discovered that these normal waste drain lines are connected into the Storm Drain System at a point upstream of a diverter valve, S5.3, that directs flow from the storm drains to the Holding Pond during normal operation or to Outfall 003 during periods of heavy rainfall. Therefore, when the diverter valve was aligned to Outfall 003, the Storm Drain System design may have allowed the mixture of storm water and steam condensate, produced from heating coils associated with the RE Supply Fans, to be released at Outfall 003. This Storm Drain System design has existed since original construction of the plant. Unpermitted discharges may have occurred intermittently since the Storm Drain System was placed in service in January 1985. This report is being submitted in accordance with NPDES Permit No. PA-0051926 as a result of a potential unmonitored effluent release from Outfall 003 which is permitted for storm water runoff only.

No adverse environmental effects have been detected at Outfall 003 that may have occurred as a result of discharging steam condensate diluted by stormwater during heavy rainfalls. We are currently evaluating the Storm Drain System design to determine a permanent solution. When this evaluation is completed, we will forward the results in a separate correspondence. In the interim,

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administrative controls have been established to ensure the diverter valve, S5.3, is positioned such that the effected Storm Drain System flow will be directed to the Holding Pond and through Monitoring Point 201 prior to releasing from Outfall 001. However, during a heavy rainfall, we may not be able to discharge from Monitoring Point 201 as quickly as needed to prevent the Holding Pond from overfilling. In this instance, Shift Supervision is instructed in accordance with administrative controls to position the diverter valve such that Storm Drain System flow is diverted to Outfall 003. These administrative controls also instruct Shift Supervision to immediately contact Chemistry personnel to begin sampling and analyzing the effluent (i.e., mixture of stormwater and diluted steam condensate) at Outfall 003 once every eight hours primarily for temperature but also for isotopic activity and pH. These interim actions ensure that all effluents entering the effected portions of the Storm Drain System will be monitored. Additionally, we will report this event in accordance with the subject NPDES Permit.

Very truly yours,



WGS/rgs

cc: U.S. Nuclear Regulatory Commission
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